

07.01-12/01/93-00512



DEPARTMENT OF THE NAVY
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IN REPLY REFER TO:

5090

18222:BRN:srw

DEC 01 1993

U. S. Environmental Protection Agency
Region III
Attn: Mr. Robert G. Thomson, P.E.
Remedial Project Manager (3HW71)
VA/WV Superfund Federal Facilities Section
841 Chestnut Building
Philadelphia, Pennsylvania 19107

Re: Draft FY-94/95 Site Management Plan (SMP) for the
Installation Restoration Program Work, Naval Weapons
Station (WPNSTA), Yorktown, Virginia

Dear Mr. Thomson:

Enclosed are three copies of the Draft FY-94/95 SMP for your review. This SMP revision is a substantial change from the Preliminary Draft SMP submitted 19 August 1993. This revision reflects the change in site prioritization as discussed between the Navy, the Commonwealth of Virginia Department of Environmental Quality (VDEQ), and your staff on 10 September 1993. Individual sites have been prioritized based on potential hazard to human health and the environment. Sites are combined only when they are located in the same general vicinity and exhibit similar types of contaminants.

Table 5-1 on page 5-2 lists 90% Remedial Design Documents, Final Remedial Designs, and Remedial Action completion reports as primary documents. The issue of whether the documents should be primary or secondary is still being discussed by the parties. This table may change once a final decision has been made on which documents will be primary.

Your comments to the Preliminary Draft SMP were received on 31 August 1993. As this Preliminary Draft SMP has been completely revised, the majority of the comments no longer apply. However, the following are general responses to those comments:

Comment No. 1 - All Site Screening Areas (SSAs) shown in Appendix A of the Federal Facilities Agreement (FFA) have been included in the Draft SMP in accordance with Section XII. SITE MANAGEMENT PLAN, Subsection 12.2, of the FFA. Areas of Concern (AOC) are not required to be included in the SMP until all Parties agree an AOC should proceed as an SSA as discussed in Subsection 9.3.D. of the FFA.

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Comment No. 2 - As discussed during our meeting of 10 September 1993 at your office, all Parties agreed that Operable Units (OUs) will be defined when remediation has been determined and a Proposed Plan (PRAP) and Record of Decision (ROD) are prepared. For the ongoing RI/FS process, all Parties agreed to keep the original site designations for all sixteen sites except Site 5. Site 5, Former Transformer Storage Area, will be the first defined OU, Operable Unit No. 1, now that the Proposed Plan and the ROD phase has commenced. The SMP will be modified to reflect Site 5's status as an OU.

Comment No. 3 - The Preliminary Draft SMP dealt with all contaminated media for all OUs. However, as discussed in Comment No. 2, the Parties' decided not to nominate sites as OUs at this time. Eventually all media will be addressed by an OU.

Comment No. 4 - Section 4.2.3 in the Preliminary Draft SMP which concerned treatability studies has been expanded. In the Draft SMP, treatability studies are discussed in Sections 3.4 and 5.2.3. The schedule for treatability studies required at this time is shown on Figure 5-14.

Comment No. 5 - The treatability studies schedule has been coordinated with the respective sites requiring them.

This SMP reflects all changes discussed at our 10 September 1993 meeting and provides an ambitious schedule for the performance of the investigative activities to occur at WPNSTA. A meeting has been scheduled at WPNSTA on 14 December 1993 to discuss this document and any other schedule type issues with all Parties. Should you have any questions or comments regarding this document, please contact Mrs. Brenda R. Norton, P.E., at (804) 322-4778.

Sincerely,



N. M. JOHNSON, P.E.
Head, Installation Restoration
Section (North)
Environmental Programs Branch
Environmental Quality Division
By direction of the Commander

Enclosure
Draft Site Management Plan (3 copies)

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Copy to: (w/o encl)
1822 (Admin Record)
WPNSTA Yorktown
VDEQ